

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

JOHN C. KITCHIN, JR., <i>et al.</i> ,)	
)	
Plaintiffs,)	Case No. 4:18-cv-00672-CDP
)	
vs.)	
)	
BRIDGETON LANDFILL, LLC, <i>et al.</i> ,)	
)	
Defendants.)	

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE PLAINTIFFS' REPLY IN SUPPORT OF MOTION FOR LEAVE**

COME NOW Plaintiffs, and respectfully request that this Court grant a seven (7) day extension to file their Reply memorandum in support of their Motion for Leave to File a Third Amended Complaint. *See* ECF 199. In support of this motion, Plaintiffs state as follows:

1. Defendants have consented to the requested extension.
2. On March 7, 2024, Defendants Allied Services, LLC, Bridgeton Landfill, LLC, and Republic Services, Inc. (hereinafter "Defendants") filed their Response in Opposition to Plaintiffs' Motion for Leave which asserted a number of complex arguments. *See* ECF 200.
3. Local Rule 7-4.01(c) requires reply memoranda in support of motions to be filed within ten (10) days after service of the memorandum in opposition, except as otherwise provided by the rules or by order of the Court.
4. Plaintiffs' reply is currently due on Monday, March 18, 2024.
5. Given the complexity of the issues and the length of Defendants' brief, Plaintiffs request a seven (7) day extension to file their Reply.
6. This extension of time is not sought for any improper purpose and will not unduly delay the case.

WHEREFORE, Plaintiffs respectfully asks that this Court grant a seven (7) day extension to file their Reply memorandum in support of their Motion for Leave, up to and including Monday, March 25, 2024.

Dated: March 12, 2024

Respectfully submitted,

KEANE LAW LLC

/s/ Ryan A. Keane

Ryan A. Keane, #62112

Tanner A. Kirksey, #72882

7711 Bonhomme Ave., Ste. 600

St. Louis, MO 63105

Phone: (314) 391-4700

Fax: (314) 244-3778

ryan@keanelawllc.com

tanner@keanelawllc.com

JOHNSON GRAY, LLC

Anthony D. Gray, #51534

319 North 4th Street, Suite 212

St. Louis, MO 63102

Phone: (314) 385-9500

agray@johnsongraylaw.com

COOPER LAW FIRM, L.L.C.

Barry J. Cooper, Jr., *pro hac vice*

Celeste Brustowicz, *pro hac vice*

Victor Cobb, *pro hac vice*

1525 Religious Street

New Orleans, LA 70130

Phone: (504) 566-1558

ssmith@sch-llc.com

bcooper@sch-llc.com

cbrustowicz@sch-llc.com

vcobb@sch-llc.com

and

Kevin W. Thompson, *pro hac vice*

David R. Barney, Jr., *pro hac vice*

2030 Kanawha Boulevard, East

Charleston, WV 25311
Telephone: 304-343-4401
Facsimile: 304-343-4405
Email: kwthompson@gmail.com

Attorneys for Plaintiffs and proposed Class

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on all counsel of record via this court's ECF/PACER electronic filing notification system on March 12, 2024.

/s/ Ryan A. Keane